

1 DEANNA L. FORBUSH
2 Nevada Bar No. 6646
3 dforbush@foxrothschild.com
4 COLLEEN E. MCCARTY
5 Nevada Bar No. 13186
6 cmccarty@foxrothschild.com
7 **FOX ROTHSCHILD LLP**
8 1980 Festival Plaza Drive, Suite 700
9 Las Vegas, Nevada 89135
10 Telephone: (702) 262-6899
11 Facsimile: (702) 597-5503

12 MATTHEW J. HOFFER (MI P70495)*
13 Matt@BradShaferLaw.com
14 ZACHARY M. YOUNGSMA Nevada Bar No. 15680
15 Zack@BradShaferLaw.com
16 **SHAFER & ASSOCIATES, P.C.**
17 3800 Capital City Boulevard, Suite 2
18 Lansing, Michigan 48906
19 Telephone: (517) 886-6560
20 *Admitted Pro Hac Vice

21 Plaintiff, Cats Meow of Vegas, LLC d/b/a Cat's Meow

22 UNITED STATES DISTRICT COURT
23 DISTRICT OF NEVADA

24 CATS MEOW OF VEGAS, LLC d/b/a Cat's
25 Meow,

26 Plaintiff,

27 vs.

28 THE STATE OF NEVADA, COVID-19
MITIGATION AND MANAGEMENT TASK
21 FORCE; STEVE SISOLAK, in his official
capacity as Governor of Nevada; AARON FORD,
22 in his official capacity as Attorney General of
Nevada; BARBARA CEGAVSKE, in her official
capacity as the Nevada Secretary of State; CITY
23 OF LAS VEGAS; CAROLYN GOODMAN, in
her official capacity as Mayor of the City of Las
Vegas; ROBERT SUMMERFIELD, in his official
capacity as Director of the City of Las Vegas
24 Department of Planning; and CALEB CAGE, in
his official capacity as Chairman of the COVID-19
Mitigation and Management Task Force,

25 Defendants.

26 Case No.: 2:20-CV-02055-APG-NJK

27 **DECLARATION OF ZACHARY M.
28 YOUNGSMA IN SUPPORT OF
PLAINTIFF'S POST-EVIDENTIARY
HEARING BRIEF**

1. I, Zachary M. Youngsma, hereby declare as follows:

2. I make this declaration upon my personal knowledge, unless specifically stated to the
3. contrary.

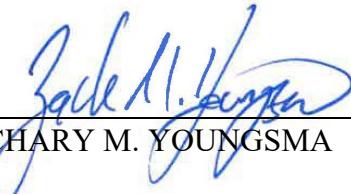
4. I am an attorney licensed to practice law in the State of Nevada employed by Shafer
5. & Associates, P.C. at 3800 Capital City Blvd. Suite 2, Lansing, Michigan 48906.

6. I am counsel of record for Plaintiff.

7. Attached hereto as **Exhibit A** is a true and accurate copy of the Las Vegas
8. Metropolitan Police Department's 2019 Annual Report pulled from the Las Vegas Metropolitan
9. Police Department's official website: <https://www.lvmpd.com/en-us/Pages/AnnualReports.aspx>, on
10. January 25, 2021.

12. **I DECLARE UNDER PENALTY OF PERJURY OF THE LAWS OF THE UNITED
13. STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.**

16. Dated: January 25, 2021



17.

ZACHARY M. YOUNGSMA